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August 11, 2017

## VIA E-FILING

Ms. Jocelyn Boyd Chief Clerk of the Commission SC Public Service Commission P. O. Drawer 11649 Columbia, SC 29211

RE:

Petition of South Carolina Electric & Gas Company for Prudency Determination Regarding Abandonment, Amendments to the Construction Schedule, Capital Cost Schedule and Other Terms of the BLRA Orders for V.C. Summer Unites 2 and 3 and Related Matters

Docket No. 2017-244-E

Dear Ms. Boyd:

Enclosed please find for filing a Petition to Intervene filed on behalf of the South Carolina Energy Users Committee ("SCEUC") in the above-captioned matter. By copy of this letter, I am serving all parties of record.

If you have questions, please do not hesitate to contact me.

Sincerely,

ELLIOTT & ELLIOTT P.A.

Scott Elliott

SE/lbk

**Enclosure** 

cc: All parties of record (w/encl.)

#### STATE OF SOUTH CAROLINA

#### BEFORE THE PUBLIC SERVICE COMMISSION

#### **DOCKET NO. 2017-244-E**

IN THE MATTER OF:	)
Petition of South Carolina Electric & Gas	)
Company for Prudency Determination	) PETITION TO INTERVENE
Regarding Abandonment, Amendments to	)
the Construction Schedule, Capital Cost	)
Schedule and Other Terms of the BLRA	)
Orders for V.C Summer Units 2 & 3 and	)
Related Matters	)

The South Carolina Energy Users Committee ("SCEUC") hereby petitions the South Carolina Public Service Commission ("Commission") pursuant to R.103-825 of the Commission's rules and regulations to intervene and be made a party of record in the above-captioned docket. In support of this Petition, SCEUC would allege as follows:

- 1. That on August 1, 2017, South Carolina Electric & Gas Company ("SCE&G") filed its petition, pursuant to S.C. Code Ann. §§ 58-33-270(E) and 58-33-280(K) (2015), to cease construction and enter a plan of abandonment for the two nuclear units (the "Units") at V.C Summer Nuclear Station in Jenkinsville, South Carolina. SCE&G's Petition requests a prudency determination regarding its decision to abandon the Units, and an order establishing the amount of the abandonment costs through September 30, 2017, associated with the Units, and for other matters related to rate mitigation and other accounting and tax items.
- 2. That SCEUC is an association organized in the State of South Carolina, consisting of large industrial consumers of energy which are engaged in various manufacturing enterprises throughout the State.

- 3. That a number of members of SCEUC purchase and consume substantial amounts of electricity from SCE&G.
- 4. That SCEUC and its members have a direct and material interest in the issues to be addressed and resolved by the Commission in this docket and the interests of its members are not adequately represented by the current parties to this proceeding.
- 5. That given the state of the record at this stage of the proceedings, SCEUC lacks sufficient information to fully develop and state its position in this proceeding at this time.
- 6. That granting SCEUC's request to be made a party of record in this proceeding is in the public interest, is consistent with the policies of the Commission in encouraging maximum public participation in issues before it, and should be allowed so that a full and complete record addressing its views and concerns can be developed.
  - 7. That Petitioner is represented by counsel in this proceeding as follows:

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# WHEREFORE, Petitioner prays for the following relief:

- a. That this Petition to Intervene be accepted and that Petitioner be made a party of record;
- b. That Petitioner be allowed to participate fully in this proceeding and take such positions as it deems advisable; and

c. For such other and further relief as is just and proper.

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Scott Elliott, Esquire ELLIOTT & ELLIOTT, P.A. 1508 Lady Street Columbia, SC 29201 (803) 771-0555

Attorney for the South Carolina Energy Users Committee

Columbia, South Carolina

August 11, 2017

### CERTIFICATE OF SERVICE

The undersigned employee of Elliott & Elliott, P.A. does hereby certify that (s)he has served below listed parties with a copy of the pleading(s) indicated below by mailing a copy of same to them in the United States mail, by regular mail, with sufficient postage affixed thereto and return address clearly marked on the date indicated below:

RE: Petition of South Carolina Electric & Gas Company for

Prudency Determination Regarding Abandonment, Amendments to the Construction Schedule, Capital Cost Schedule and Other Terms of the BLRA Orders for V.C.

Summer Unites 2 and 3 and Related Matters

Docket No.: 2016-244-E

PARTIES SERVED: Jeffrey M. Nelson, Esquire

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PLEADING: PETITION TO INTERVENE BY SOUTH CAROLINA

**ENERGY USERS COMMITTEE** 

Linda B. Kitchens, Paralegal

August 11, 2017

ELLIOTT & ELLIOTT, P.A.